

PRIVACY STATEMENT
LEASEWEB SINGAPORE PTE. LTD.

Your privacy is important to Leaseweb Singapore Pte. Ltd. (hereinafter "Leaseweb SG"). Leaseweb SG duly informs you of Leaseweb SG's practices as unmanaged cloud hosting provider (unless explicitly provided otherwise) with respect to the possible processing of personal information while doing business with you ("Personal Data").

COMPLIANCE WITH DATA PROTECTION LAWS

Leaseweb SG is subject to Singapore Personal Data Protection Act 2012 ("PDPA") and if to the extent applicable international data protection laws, in particular the EU General Data Protection Regulation 2016/679 ("GDPR"), both referred to as Privacy Acts.

HOW LEASEWEB SG MAY COLLECT INFORMATION ABOUT YOU (IN OUR ROLE AS DATA CONTROLLER UNDER THE GDPR)

Leaseweb SG may collect your Personal Data when:

- You order a service from Leaseweb SG.
- You enter a promotion run by Leaseweb SG.
- You participate in a Leaseweb SG survey.
- You subscribe to a Leaseweb SG newsletter.
- You ask Leaseweb SG for more information about a Leaseweb service, or contact Leaseweb SG with a question, comment, or complaint.
- You submit an abuse notification to Leaseweb SG.
- You use the Leaseweb SG network, Leaseweb SG infrastructure and/or other Leaseweb SG services.

In addition, Leaseweb SG may collect your Personal Data as received from fraud-prevention agencies, referral partners, business directories and credit reference agencies.

WHAT KIND OF INFORMATION LEASEWEB SG MAY COLLECT ABOUT YOU IN ACCORDANCE WITH THE PRIVACY ACTS (IN OUR ROLE AS DATA CONTROLLER UNDER THE GDPR)

Leaseweb SG may collect the following information about you:

- Your business contact person's name, address, phone number, email address, business and ID registrations that may include photo and personal identification numbers and such contact details of legally authorized representatives.
- Your Leaseweb SG account information – such as Leaseweb SG services you ordered, domain name registration information, the IP addresses assigned to you, your customer ID, fees owed and received, the use of Leaseweb SG services or any other information related to your account.
- Your contact with Leaseweb SG – such as a notes or recordings of any calls you make to Leaseweb SG, a chat records when you engage in a chat session with Leaseweb SG, an emails or letters you send to Leaseweb SG or other records of any contact you have with Leaseweb SG.
- Information about your payment method, such as credit card number, bank account number or other banking information.
- Information provided by you to Leaseweb SG when you notify Leaseweb SG of a (suspected) breach of Leaseweb SG's acceptable use policies.
- Video footage of you when you are in a data center or the public space outside and inside our offices.
- Photo of you when you access a data center by using a personalized ID badge.
- Your biometric data including fingerprint when you access a data center.
- Documents and information that certify your identity.

WHY LEASEWEB SG PROCESSES YOUR PERSONAL DATA IN ACCORDANCE WITH THE PRIVACY ACTS (IN OUR ROLE AS DATA CONTROLLER UNDER THE GDPR)

Leaseweb SG may process your Personal Data to:

- Process your Orders and Sales Contracts and provide services, which may include performing customer verification.
- Process vendors contact details for the procurement of services, and communicating with vendors to provide information about services of Leaseweb SG and affiliated entities.
- Conduct market research, retention and customer satisfaction surveys, (direct) marketing activities (including through email newsletters, social media and onsite/offsite and online/offline advertisement), sales activities to make personalized offers and quotations and offering promotions.
- Communicate with customers to (i) provide information about services of Leaseweb SG and affiliated companies, (ii) provide information about offers, Orders and Sales Contracts, provision of services, order status and payment, (iii) provide support and maintenance services, (iv) handle complaints, and (v) answer questions from (potential) customers.
- Perform financial processes, including to (i) calculate, invoice and collect service Fees, (ii) process financial transactions regarding the acceptance of Orders, and (iii) grant debt collection rights to third parties.
- Investigate creditworthiness and perform risk management, including to prevent overextending credit to (potential) customers and verifying whether (potential) customers will be able to comply with financial obligations.
- Investigate and process suspected violations of Leaseweb SG's Policies.
- Ensure the security of persons, goods and objects, and perform fraud detection.
- Conduct legal processes and comply with legal requirements, including in relation to legal proceedings, and evidence gathering processes, and complying with court orders.
- Comply with statutory obligations, including to (i) provide data to authorized authorities in the context of criminal investigations, (ii) comply with applicable data retention obligations, and (iii) the provision to third parties of data concerning customers in connection with an infringement of these third parties' rights.
- Establish the identity of customers or third parties, including provide access to data centers and our offices.

SHARING YOUR PERSONAL DATA WITH THIRD PARTIES (IN OUR ROLE AS DATA CONTROLLER UNDER THE GDPR)

Leaseweb SG may share your Personal Data with:

- Its group affiliate Leaseweb Global B.V. ("Leaseweb Global") as the intercompany shared services provider in its role as a Data Sub-Processor as well as the operator of the Leaseweb website for the purposes of financial, tax, sales, (direct) marketing (including the websites www.leaseweb.com, the Leaseweb Customer Portal and the Leaseweb API) that may be used to order or manage Leaseweb SG Services or to communicate with Leaseweb SG.
- Suppliers involved in delivering the services you've ordered with Leaseweb SG.
- Credit reference, fraud prevention or business scoring agencies, or other credit scoring agencies.
- Domain name registries when Leaseweb SG registers a domain name on your behalf.

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- Debt collection agencies or other debt recovery organizations.
- Leaseweb SG may also disclose your personal information as permitted or required by law.
- A Leaseweb SG customer, if you notify Leaseweb SG that this customer's use of Leaseweb SG services violates the Leaseweb SG's Policies or applicable laws.
- A third party that has claimed that your use of the Leaseweb SG services violates the Leaseweb SG's Policies or applicable laws (to the extent such sharing is required by law).

RETENTION PROCEDURES

Leaseweb SG will cease to retain its documents containing Personal Data, or remove the means by which the Personal Data can be associated with particular individuals, as soon as it is reasonable to assume that the purpose for which that Personal Data was collected is no longer being served by retention of the Personal Data, and retention is no longer necessary for legal or business purposes.

LEGAL GROUNDS UNDER THE PRIVACY ACTS

To process your Personal Data as described above, we rely on the following legal bases:

1. **Performance of a contract:** the use of your information may be necessary to perform the contract that you have with us. For example, if you use our services, we will use your information to carry out our obligation to complete and administer that service under the contract that we have with you.
2. **Legitimate interests and/or Business improvements:** the processing is necessary for the purposes of the legitimate interests pursued by us, for example information security. We also endeavour to provide you with the best suitable content through the website, emails and newsletters, to improve and promote our products and services, and to enhance our administrative functions, fraud detection and legal purposes.
3. **Consent:** For marketing advertisement (excluding operational communication as part of the services), you are free to withdraw your consent at any time.

CONSENT TO RECEIVE DIRECT MARKETING EMAILS AND WITHDRAWAL OF CONSENT

You are free to decide whether or not to share certain Personal Data (if any) with us for direct marketing purposes. However, if you decide not to provide certain Personal Data, or if you withdraw your consent thereto at a later moment, this may have affect how you experience our marketing for similar services. You are entitled to withdraw your consent by sending an email to the privacy email address listed below, or from direct marketing communication by opting-out from such communications. Upon receipt of your opt-out request, we will opt you out from the direct marketing list.

ACCESS CONTROL BY DATACENTERS

Providers of data centers in Singapore are not part of the Leaseweb group. Some data centers may require you to use a personalized ID badge, other data centers may require you to use a biometric access control system to gain unescorted access to the data center.

Customer is aware that a data center is responsible for the physical access and control of its premises as a Data Controller. Each data center is solely responsible for determining and executing its access control policies as indicated in their House Rules, including the processing of such biometric data for its access control system.

TECHNICAL AND ORGANIZATIONAL SECURITY PROCEDURES AND DATA TRANSFERS

In view of the EU GDPR, Leaseweb has taken and will maintain the appropriate technical and organizational security measures for protection of the security, confidentiality and integrity of Customer's Personal Data as described below.

TECHNICAL MEASURES

- Data Encryption:
 - Full disk encryption of all Leaseweb managed employee endpoints (data at rest).
 - Leaseweb has strong cryptography & security protocols with respect to data transmission via TLS or VPN (data in transit).
- Access Controls:
 - Access permissions based on least-privilege and need-to-know.
 - We have policies and procedures in place for on- and offboarding of Leaseweb employees with regards to access management.
 - Robust authentication and password related policies are in place and monitored.
 - Tools are made available to enable Leaseweb employees to work securely (such as password manager, VPN client, endpoint protection on all Leaseweb employee endpoints).
- Secure Development:
 - Code changes require a six-eyes principal.
 - (Security) Configuration of servers is based on infrastructure-as-code where possible.
 - All development teams are audited by the Leaseweb's security team twice a year based on a security maturity model.
 - Segregation between development, test and production environments.
 - Version control on Leaseweb's codebase.
- Network Security:
 - Network segmentation on Leaseweb's internal networks.
 - Firewalls are used in Leaseweb's internal network.
 - Intrusion detection systems are used within Leaseweb's internal network.
- Vulnerability Management:
 - Anti-virus software with EDR capabilities is installed on every Leaseweb employee endpoint to detect and stop the abuse of vulnerabilities.
 - Vulnerability monitoring, pentesting and red-teaming exercises are performed.

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ORGANIZATIONAL MEASURES

- Information Security Governance:
 - Leaseweb operates an Information Security Management System ("ISMS"), conforming to the ISO 27001 standard.
 - This ISMS is audited on an annual basis by internal as well as external auditors.
 - Periodic contact with interested parties, such as security service providers, government and peer organisations to exchange threat intelligence and vulnerability information.
 - Leaseweb has a dedicated IT Security department.
- Data Deletion:
 - Wiping of Leaseweb equipment in use by Customer after termination of the Sales Contract.
 - Physical destruction of broken hard drives.
 - Secure paper disposal facilities are available.
- Employee Training:
 - Leaseweb employees have periodic mandatory security awareness training with varying topics including privacy awareness.
 - Periodic phishing simulations for all Leaseweb employees.
- Risk management:
 - Security risk assessments are performed on a periodic basis.
 - A security risk register is maintained and updated.
- Vendor Management:
 - Periodic vendor screening to evaluate and manage risks related to existing and new vendors.
- Physical Security:
Data centers and offices are secured to prevent unauthorized access:
 - Periodic reviews of physical security authorizations.
- Documentation and Record-Keeping:
 - Leaseweb maintains records of security policies and procedures.
 - Records are kept in our internal documentation and are updated periodically.
- Continuous Monitoring of Leaseweb's internal IT environment by:
 - Security information and event management ("SIEM") tooling
 - A third-party Security Operating Center ("SOC") that monitors the internal IT environment.
- Audits and certifications:
 - Internal auditing: Leaseweb performs internal audits on security related controls on a yearly basis.

LEASEWEB SG IN ITS ROLE AS UNMANAGED IAAS CLOUD PROVIDER (UNLESS EXPLICITLY PROVIDED OTHERWISE) (DATA-PROCESSOR)

Any possible Customer Personal Data that is hosted, transmitted or processed on equipment you own (Co-location) or any possible Customer Personal Data hosted, transmitted or processed by Leaseweb SG in the delivery of the services on your behalf, is governed by this paragraph for Leaseweb as Data Processor, and any actions performed by Leaseweb SG in relation to such Personal Data shall be solely governed by the Sales Contract concluded between Leaseweb SG and its customer.

The customer of Leaseweb SG that owns the equipment (Co-location) or uses Leaseweb SG services, determines the purposes and means of the processing of Personal Data and therefore is to be considered the Data Controller in regards to such processing whereby Leaseweb SG has no logical access to such Personal Data.

DATA RESIDENCY

The data hosted on your own infrastructure or on Leaseweb's infrastructure is located in Singapore.

DATA SOVEREIGNTY

Leaseweb SG has no possession, custody, or control over any Personal Data that is stored in the E.U. or that controlled by other Leaseweb Sales Entities.

In our role as Data Processor under the GDPR, we offer to EU-based customers the [Standard Contractual Clauses](#) to enable the lawful transfer of Personal Data from the European Economic Area ("EEA") and Switzerland to other countries globally, unless such country is qualified with an Adequacy Decision. The Standard Contractual Clauses sets out Leaseweb SG's commitment to privacy and data protection when processing data in connection with the provision services to our customers and dealing with the transfer of Personal Data outside the EEA and Switzerland in connection with the provision of such services.

DATA PROTECTION OFFICER

Leaseweb SG has appointed a Data Protection Officer ("DPO") to oversee the data protection responsibilities under PDPA and is also registered with the Dutch supervisory authority under number FG008004, positioned at our global headquarters in The Netherlands, readily available during Singapore business hours if required. This office as the global intercompany shared service provider offers expertise related to (international) data protection laws, in particular GDPR compliance, effectively centralizing our connection with the Dutch supervisory authority, as the permitted one-stop shop facility. The DPO can be reached at: legal@leaseweb.com.

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YOUR RIGHTS

In accordance with the Privacy Acts, you have a number of rights regarding your Personal Data and the processing thereof including but not limited to:

- You can view and, if necessary, change your Personal Data in your account at any time.
- You can request the Personal Data processed about you.
- You also have the right to obtain from us the erasure of your Personal Data after the termination of the Sales Contract ("Right to be Forgotten") in case and to the extent duly required and permitted.
- In addition, you may, under certain circumstances, have the right to restriction of the processing of your Personal Data.
- You have the right to object, on grounds relating to your particular situation, at any time to processing of your Personal Data.
- You have a right to object against the processing of your Personal Data for direct marketing purposes (e.g., per electronic message, per phone or per mail) by making use of the opt-out button in communications emails and/or rejected the opt-in.
- You have the right to receive your Personal Data, which you have provided to us, in a structured, commonly used and machine-readable format and have the right to transmit those data to another controller when the processing is based on your consent or is necessary for the performance of a contract.

If you have any requests regarding the abovementioned, please contact us using the contact details below. If we do not grant your request, we will inform you about the reason why.

RIGHT TO LODGE A COMPLAINT WITH YOUR LOCAL SUPERVISORY AUTHORITY

You have a right to lodge a complaint with your local supervisory authority if you have concerns about how we are processing your Personal Data. We ask that you please attempt to resolve any issues with us first, although you have a right to contact your supervisory authority at any time. If you make a complaint, we will endeavor to respond to it as soon as possible. If you are dissatisfied with our response, you have the right to make a complaint to Personal Data Protection Commission, their contact details are set out on the following page: <https://www.pdpc.gov.sg/contact-us>.

STATEMENT CHANGES

Leaseweb SG may change this Privacy statement and will post any revisions on the Leaseweb website www.leaseweb.com. Leaseweb SG may modify or amend this Privacy Statement from time to time as our business practices and legal requirements evolve. If this Privacy Statement is modified, Leaseweb SG will provide notice of the change by posting the updated Privacy Statement on our website. Leaseweb SG advises you to check this page regularly to see if any changes have been implemented.

CONTACT INFORMATION

If you have any requests, questions, or suggestions about Leaseweb SG's privacy practices, please send an email to privacy@sg.leaseweb.com.

Leaseweb Singapore Pte. Ltd., private company with limited liability, incorporated under the laws of Singapore with UEN 201332642C, and having its visiting address at Tai Seng Avenue, Tai Seng Exchange, Tower A #04-13, 536464, Singapore.